

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MOELLER TO INTERROGATORIES OF THE NEWSPAPER
ASSOCIATION OF AMERICA
(NAA/USPS-T32—1-2)**

The United States Postal Service hereby provides the responses of
witness Moeller to the following interrogatories of the Newspaper Association of
America: NAA/USPS-T32—1-2, filed on November 5, 2001.

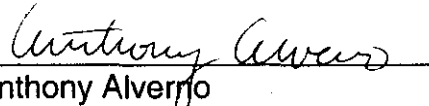
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anthony Alverro
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2997; Fax -6187
November 19, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MOELLER
TO INTERROGATORIES OF NEWSPAPER ASSOCIATION OF AMERICA**

NAA/USPS-T32-1: Please refer to Page 10, line 7, through Page 11, line 14, at which you discuss your proposal to increase the pound rate for Standard Regular commercial mail. What is the implicit cost coverage for Standard Regular mail under the proposed rates for pieces above and below the following weights:

- a. 3.0 ounces
- b. 3.5 ounces.

RESPONSE:

Please see the response to VP/USPS-T32-4d.

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NAA/USPS-T32-2: Why do you not discuss the implicit cost coverages of pound-rated and piece-rated Standard A Regular commercial mail at your proposed rates?

RESPONSE:

Please see the response to VP/USPS-T32-4c.

DECLARATION

I, Joseph D. Moeller, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

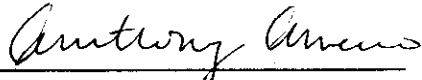


JOSEPH D. MOELLER

Dated: 11-19-01

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Anthony Alverno

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